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# CPI Competition Policy Institute

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August 22, 1997

Mr. William Caton  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

RECEIVED

AUG 22 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Re: CC Docket 96-45 -- Nomination for Membership on the  
Universal Service Administrator Advisory Committee**

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List A B C D E

Dear Mr. Caton:

As President of the Competition Policy Institute, I am writing to nominate Debra Berlyn for membership on the Universal Service Administrator Advisory Committee to represent the interests of consumers.

The Competition Policy Institute is an independent, non-profit organization that advocates policies to bring competition to telecommunications and energy markets in ways that benefit consumers. CPI's Charter, describing the goals and principles of the organization, is included in the attachments to this letter. When developing its policy positions, CPI obtains guidance from its Consumer Advisory Committee, comprised of state and national consumer advocates.

CPI has actively participated in numerous proceedings before the Commission concerning the implementation of the Telecommunications Act, including a series of comments and ex parte communications regarding universal service, CC Docket 96-45. A list of the federal proceedings in which CPI has participated is attached.

As the enclosed biography indicates, Debra Berlyn serves as CPI's Executive Director and is co-founder of the organization. Immediately prior to forming CPI, Ms. Berlyn was the Executive Director of the National Association of State Utility Consumer Advocates. Debra Berlyn is a strong advocate for utility consumers and has led CPI in its efforts to promote pro-consumer and pro-competitive policies.

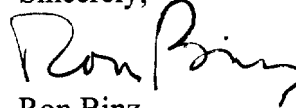
CPI has a record of developing policy positions that seek to promote a competitive market that serves all consumers and is dedicated to the goals of universal service and the FCC's universal service policy objectives. Debra Berlyn is interested in serving on this Advisory

Committee to be able to participate, on behalf of the interests of consumers, in the selection of a neutral, third-party permanent universal service administrator. In the course of serving on this Committee, Ms. Berlyn will participate to the full extent and in accordance with the objectives of the Committee.

In conclusion, I respectfully nominate Debra Berlyn to be a member of the Universal Service Administrator Advisory Committee and urge her appointment to the Committee.

Thank you for your consideration of this nomination.

Sincerely,



Ron Binz  
President

cc: Sheryl Todd  
FCC Universal Service Branch

CPI Nominee for Universal Service Administrator Advisory Committee:

Debra Berlyn  
Executive Director  
Competition Policy Institute  
1156 15th Street, N.W., Suite 310  
Washington, D.C. 20005

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# CPI Competition Policy Institute

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## **Debra R. Berlyn**

Debra Berlyn co-founded the Competition Policy Institute in April, 1996 and serves as Executive Director of the non-profit organization. As Executive Director, Debra manages the execution of CPI's advocacy, research, and coalition building activities and works with the CPI senior staff to develop CPI's policy positions.

Immediately prior to creating CPI, Debra served as the Executive Director of the National Association of State Utility Consumer Advocates (NASUCA) for over six years. NASUCA is comprised of 41 state-appointed offices of utility consumer advocates in 38 states and the District of Columbia. Debra was responsible for overall management of the Association and served as the liaison with federal agencies and Congress on all utility issues. As Executive Director, she focused on national telecommunications and energy policy.

Debra represented the Association on panel discussions held by numerous national organizations and federal agencies. In her capacity as Executive Director, she worked closely with the consumer and industry community to communicate the policy positions of NASUCA members.

Prior to her position with NASUCA, Debra worked for several public interest organizations, developing grassroots lobbying programs and campaigns.

Debra currently serves as a faculty instructor with Boston University's Washington Program. Her classes focus on shaping public policy and current national issues. She received a B.A. from the American University and a M.A. from Northwestern University.

Debra lives in Chevy Chase, Maryland with her husband and two daughters.

# CHARTER

## COMPETITION POLICY INSTITUTE

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### Principles and Objectives

The Competition Policy Institute (CPI) was established in 1996 by two veteran consumer advocates, Debra Berlyn and Ron Binz. CPI, a non-profit organization, was established to develop and advocate policies which will bring the benefits of competition to consumers of telecommunications and energy services. CPI is a new voice to support state and federal policies which will promote competition in these industries in ways that benefit customers.

The Institute is guided by these goals and principles for the policies it supports:

- Fair prices for all consumers;
- Increased choices of services and providers;
- Quality and reliability of service;
- Fair and effective competition; and
- Innovative policies during the transition to competition.

### CPI Activities

The Competition Policy Institute participates in selective legislative and regulatory forums at both the state and federal levels and will employ a variety of methods to achieve its objectives. These include: advocacy in state and federal legislative and regulatory proceedings; research and consumer education; and coalition building.

Advocacy: CPI participates in legislative and regulatory proceedings in key states and in Washington, D.C. This includes filing comments and presenting testimony in regulatory proceedings, participating in negotiations, meeting with decision-makers; and working on state and federal legislative issues.

Research and Education: CPI intends to affect the course of state and federal policies implementing competition. Research on consumer attitudes about competition and the reverse process of educating consumers about the possibilities and benefits of competition are powerful tools in

influencing decision makers. Specific activities include conducting survey and opinion research, producing publications, speaking at consumer and regulatory conferences and shaping public opinion by maintaining a strong public image on the issues.

Coalition Building: CPI maintains strong ties to consumer organizations involved in regulatory and legislative forums where competition issues are decided. CPI will attempt to bring consumer groups with similar interests in telecommunications and energy competition together to participate in proceedings. CPI also actively seeks to expand consumer involvement by bringing in consumer organizations or business groups not currently involved in the issues.

### **Funding**

CPI has sought funding from a broad range of industry sponsors that support the objectives and principles of CPI. This funding ensures a base level of activity to participate in state proceedings and to maintain a national presence on the issues.

### **Governance**

The activities of CPI are directed by its senior staff. The Competition Policy Institute operates independently of its sponsors and is not established to promote specific positions of its sponsors, except as those that are consistent with the goals and objectives of the CPI. The selection of specific activities and determination of the organization's position on specific issues will be made by a senior staff based on input from three sources: a consumer advisory committee; the sponsors; and research conducted by the project.

### **Consumer Advisory Committee**

The CPI has assembled panels of national and state consumer representatives to serve in an advisory role, representing the interests of residential and business consumers. The representatives have a solid base of knowledge about telecommunications and energy issues and a genuine commitment to representing consumer interests in developing effective competition. The committee serves as an advisor to the project staff and does not set or approve policy.

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# CPI Competition Policy Institute

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## **LIST OF CPI FCC ACTIVITIES APRIL 1996 - AUGUST 1997**

- CC Docket No. 96-45 Universal Service Reply Comments, 5/7/96
- Petition to the FCC: Preemption of Texas Public Utility Regulatory Act of 1995, 5/20/96
- CC Docket No. 96-98 Implementation of Local Competition Provisions of the Act, Comments, 5/16 and Reply Comments, 5/30/96
- CCBPol Docket No. 96-14, Petitions Concerning the Texas Public Regulatory Act of 1995, Comments, July 3, 1996 and Reply Comments, July 18.
- CC Docket No. 96-115, Customer Proprietary Network Information, Reply Comments 6/26/96
- CCBPOL No. 96-14, Petition concerning the Texas Public Regulatory Act of 1995, Comments 7/3/96, Reply Comments 7/18/96
- CC Docket No. 96-98, Ex Parte: Interconnection Rates, Access Charges and Competition, 7/23/96
- CC Docket No. 92-297, Rules and Policies for LMDS, Comments 8/12/96, Reply Comments 8/22/96
- Ex Parte letter concerning Universal Service Workshop, 9/17/96
- Bell Atlantic/NYNEX Merger Application, Tracking No. 960221, CPI Petition to Impose Conditions, 9/23/96
- CC Docket No. 96-45, Ex Parte: CPI's Universal Service Plan, 10/4/96
- Report No. LB-96-32, Ex Parte: FCC's Review of SBC Communications/Pacific Telesis Proposed Merger, 11/22/96
- GN Docket No. 96-228, Amendment of the Commission's Rules to Establish Part 27, the Wireless Communications Service ("WCS"), Comments 12/4/96
- Memo on Access Charge Reform, 12/5/96
- CC Docket No. 96-45, Comments on the Universal Service Joint Board Recommended Decision, 12/19/96, Reply Comments, 1/10/97
- CC Docket No. 96-262, 94-1, 91-213, 96-263, Comments on Access Charge Reform and related dockets, 1/29/97
- Petition for Declaratory ruling, FCC Authority Over LATA Boundaries, 3/3/97. Joint Petition with Minnesota Department of Public Service
- CC Docket No. 96-115, Further comments on Implementation of the Telecommunications Act of '96, 3/17/97
- Petition for Declaratory Ruling Regarding USWest's Petitions to Consolidate LATAs in Minnesota and Arizona, DA 97-480/NSD-L-97-6, Reply Comments, 3/24/97. Joint filing with Minnesota Department of Public Service

- CC Docket No. 96-254, Implementation of Section 273 of the Communications Act of 1934, as amended by the Telecommunications Act of 1996, Reply Comments, 3/26/97.
- Ex Parte Communication, Memorandum Concerning the Petition for Declaratory Ruling, Preemption, and Other Relief Filed by TCI Cablevision concerning the City of Troy, Michigan, 4/2/97.
- CC Docket No. 96-262, Ex Parte Filing, Legal Memorandum Concerning the Legal Authority of the FCC to Prescribe Reductions in Access Charges, 4/8/97.
- Ex Parte Communication, CPI Comment on Access Charge Reform/Universal Service Funding Proposals, 4/18/97.
- CC Docket No. 97-121, Motion to Dismiss and Request for Sanctions: SBC 271 Application for Provision of In-Region InterLATA Services in Oklahoma, 4/28/97.
- CC Docket 97-121, Comments on SBC 271 Application for Provision of In-Region InterLATA Services in Oklahoma, 5/1/97, Reply Comments 5/27/97
- Ex Parte Communication, CPI Memorandum Urging FCC to Include Access Charge Reductions in Order/ Options for Achieving a \$2.25 Billion Reduction, 5/5/97
- Petition for reconsideration or clarification of USWest Communications, Inc. consolidation of LATA's, DA# NSD-L-97-6, Joint comments with Minnesota Department of Public Service. 6/4/97
- Application for review of Arizona corporation commission – LATA boundaries. DA#NSD-L-97-6, Joint comments with Minnesota Department of Public Service. 6/5/97
- CC Docket No. 96-262, 94-1, Opposition to joint petition for partial stay & for imposition of an accounting mechanism pending judicial review. 6/9/97
- CC Docket No. 97-137, Comments on Ameritech 271 Application pursuant to section 271 of the Communications Act of 1934 for provision of in-region interLATA services in Michigan, 6/10/97, Reply Comments, 7/8/97
- CC Docket No. 97-100, Comments on petition for expedited declaratory ruling, preemption of Arkansas Telecommunications regulatory reform Act of 1997, 7/7/97, Reply Comments 7/22/97
- CC Docket No. 97-121, RM 9101, Comments on petition for expedited rulemaking to establish reporting requirements and performance and technical standards for operation support systems (OSS), 7/10/97, Reply Comments 7/30/97
- Ex Parte Communication re: "Realistic Choice" approach, 8/4/97
- CC Docket Nos. 96-262; 94-1; 91-213; 95-72; 96-45. Comments on Partial Support & Partial Opposition to the Petitions for reconsideration & clarification, 8/18/97

Panelist: Federal-State Universal Service Joint Board Meeting, 4/12/96

Speaker: Public Forum on Access Charge Reform and Universal Service, 9/12/96

Speaker: Public Forum on Telecommunications Act of 1996, Section 253 Issues, 12/16/96